

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Laura Egerman, Esq. (LE-8250)	CASE NO.: 17-19125-jnp CHAPTER 13
In Re: KARL KRAMER Debtor, DAWN KRAMER, Joint Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

NATIONSTAR MORTGAGE LLC. ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 11), and states as follows:

1. Debtor, KARL KRAMER, and Joint Debtor, DAWN KRAMER, (collectively "Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on May 2, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 224 KEYSTONE AVENUE, BLACKWOOD, NJ 08012, by virtue of a Mortgage recorded on November 10, 2009 in Book 09132, at Page 0353 of the Public Records of Camden County, NJ. Said Mortgage secures a Note in the amount of \$144,844.00.
3. The Debtor filed a Chapter 13 Plan on May 16, 2017.
4. Debtor's Plan fails to state the total arrearage amount owed. It is anticipated that Secured Creditor's claim will show the pre-petition arrearage due Secured Creditor is \$3,070.54. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$3,070.54 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Laura Eggerman
Laura Eggerman, Esquire
NJ Bar Number LE-8250
Email: legerman@rasnj.com

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CERTIFICATION OF SERVICE

1. I, Laura Egerman, represent NATIONSTAR MORTGAGE LLC. in this matter.
2. On June 28, 2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: **Objection to Confirmation of Debtors' Chapter 13 Plan.**
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

June 28, 2017

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Laura Egerman
Laura Egerman, Esquire
NJ Bar Number LE-8250
Email: legerman@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Paul Young, Esq. Young, Marr & Associates 3554 Hulmeville Road Suite 102 Bensalem, PA 19020	Attorney for Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Isabel C. Balboa, Esq. Chapter 13 Standing Trustee Cherry Hill Corporate Center 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
US Department of Justice Office of the U.S. Trustee One Newark Center, Suite 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)